

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ORIGINAL

JANNA L.V. SAKSON,

Plaintiff,

- against -

CONCORDIA COLLEGE – NEW YORK FOUNDATION,
INC., d/b/a CONCORDIA COLLEGE NEW YORK,

Defendant.

~~PROPOSED~~
SCHEDULING ORDER

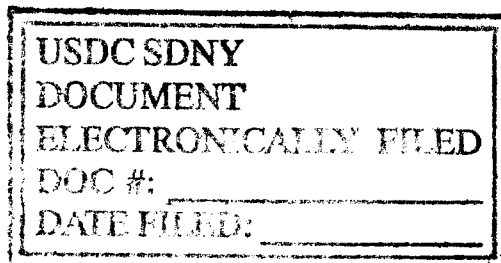
07 Civ. 3709

(WCC)

ECF CASE

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the parties, by and through their attorneys, submit the following proposed discovery plan in the above-captioned action:

1. If not already provided, Initial Disclosures pursuant to Fed. R. Civ. P. 26(a) (1) shall be made on or before July 27, 2007.
2. No motion to join additional parties will be permitted after ~~August 15, 2007~~ October 15, 2007
3. No motion to amend the pleadings will be permitted after ~~August 15, 2007~~ October 15, 2007
4. All fact discovery shall be completed on or before January 31, 2008.
5. Plaintiff is to identify expert witnesses and serve reports from expert witnesses on or before January 15, 2008. Defendant is to identify rebuttal expert witnesses and serve reports from these expert witnesses on or before February 15, 2008. Depositions of experts are to be completed on or before March 31, 2008.



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6. Any party wishing to make a motion for summary judgment must file a request for a pre-motion conference in accordance with Judge Conner's rules on or before **March 21, 2008.**

Consented to:

NIXON PEABODY LLP

By: 

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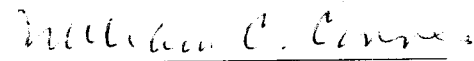
By: 

Mitchell I. Weingarden (MW-0294)

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Attorneys for Plaintiff

So Ordered:


Hon. William C. Conner
Senior United States District Judge

Dated: July 13, 2007
White Plains, New York